

PHILLIP A. TALBERT
United States Attorney
MICHAEL G. TIERNEY
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HEATHER STANLEY,

Defendant.

CASE NO. 1:20-CR-00045 JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

BACKGROUND

This matter is currently scheduled for a status conference on **June 1, 2022**. The parties request that a final status conference (as directed by the Court's Minute Order of May 16, 2022) be set on **August 31, 2022**. The parties continue to engage in plea negotiations or, in the alternative, to prepare for trial. A Plea agreement was previously submitted to the defendant for review, and defense counsel and the defendant are engaged in continuing discussions regarding potential resolution. The parties also continue to review the discovery produced in this matter and evaluate evidence for possible trial.

The parties are aware that they must be prepared on August 31, 2022, to set a trial date if the case has not been resolved.

Counsel agrees that time between the current date of the status conference and August 31, 2022 should be excluded under the Speedy Trial Act for defense preparation and continuity of counsel.

A proposed order appears below.

STIPULATION AND ORDER

IT IS HEREBY STIPULATED by and between the parties hereto, and through their respective attorneys, that the status conference currently set for June 1, 2022, be continued to August 31, 2022. Time shall be excluded from June 1, 2022, to August 31, 2022, under the Speedy Trial Act for defense preparation and continuity of counsel. The Court finds that the ends of justice outweigh the interest of the defendant and the public in a speedy trial.

IT IS SO STIPULATED.

Dated: May 23, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ MICHAEL G. TIERNEY
MICHAEL G. TIERNEY
Assistant United States Attorney

Dated: May 23, 2023

/s/ per email authorization
DAVID A. TORRES
Counsel for Defendant
HEATHER STANLEY

ORDER

The parties shall be prepared to select a mutually agreeable trial date at the next status conference.

IT IS SO ORDERED.

DATED: 5/24/2022

Sheila K. Oberto
Hon. Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE